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13 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
ITS OPPOSITION TO UBER'S
MOTION TO COMPEL
INTERROGATORIES (DKT. 1143)**

Trial Date: October 10, 2017

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Plaintiff's Administrative Motion to File Under Seal Its Opposition to Uber's Motion
6 to Compel Interrogatories (Dkt. 1143).

7 2. I have reviewed the following documents and confirmed that only the portions
8 identified below merit sealing:

9

Document	Portions to Be Filed Under Seal
Exhibit 3	Marked portions (in red boxes)

10
11

12 3. The marked portions (in red boxes) of Exhibit 3 contain highly confidential
13 information regarding the details of acquisition and employment agreements for companies and
14 individuals with which Defendants have ongoing relationships, including the specific financial
15 terms of these agreements. This highly confidential information is not publicly known, and its
16 confidentiality is strictly maintained. I understand that disclosure of this information would allow
17 competitors to gain insight into how Uber negotiates and structures its business agreements,
18 which would allow competitors to tailor their own business strategy. Uber's competitive standing
19 could be harmed.

20 4. The marked portions (in red boxes) of Exhibit 3 also contain highly confidential
21 information regarding Defendants' employment strategy, including in relation to people currently
22 employed by Uber. This highly confidential information is not publicly known, and its
23 confidentiality is strictly maintained. I understand that disclosure of this information would allow
24 competitors to gain insight into how Uber approaches its employment negotiations and
25 employment philosophy, which would allow competitors to tailor their own employment strategy.
26 Uber's competitive standing could be harmed.

27 5. Defendants' request to seal is narrowly tailored to those portions of Plaintiff's
28 Opposition and its supporting exhibits that merit sealing.

1 I declare under penalty of perjury under the laws of the United States that the foregoing
2 is true and correct. Executed this 14th day of August, 2017, at Los Angeles, California.

3
4
5 /s/ Michelle Yang

Michelle Yang

6
7
8 **ATTESTATION OF E-FILED SIGNATURE**

9 I, Arturo J. González, am the ECF User whose ID and password are being used to file this
10 Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has
11 concurred in this filing.

12 Dated: August 14, 2017

/s/ Arturo J. González

Arturo J. González